

EXHIBIT B

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1 SUPREME COURT: ALL COUNTIES
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5 IN RE: NEW YORK CITY
6 ASBESTOS LITIGATION
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9 DEPOSITION
10 UNDER ORAL
11 EXAMINATION
12 OF
13 JOHN BEREI
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16 This Document Applies To:
17 JOHN BEREI
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1 all over the ship there was miles and
2 miles of insulated piping. Correct?

3 A. Yes.

4 Q. If you hit rough seas, would that
5 shake the ship?

6 A. Yes. Vibration. It had twin
7 screws. It vibrated a lot. If the seas
8 were rough, the screws came out of the
9 water. And you'd be -- you'd be shaking.

10 Q. And when the ship would vibrate
11 like that, whether the screws were turning
12 at full force, or if the ship was in rough
13 seas, or if the guns were firing, the
14 insulation on all that piping would shake
15 loose. Is that correct?

16 MR. CHANDLER: Objection. Do you
17 know that?

18 A. No. I don't know that.

19 BY MR. MOHR:

20 Q. You don't know that? Okay. How
21 about on any of the other equipment?
22 Did you not know whether any of the
23 insulation would shake loose either?

24 A. I wouldn't know that.

25 Q. Okay. Specifically another one

1 of the pump manufacturers you had
2 mentioned was a manufacturer named
3 Buffalo. Do you recall that testimony?

4 A. Yes.

5 Q. And I know a lot of these questions
6 are going to sound somewhat redundant.
7 But could you tell me a ship or location
8 where you observed a Buffalo pump?

9 A. Probably in the shipyard. Vallejo.

10 Q. Okay. So, not on the Chehalis?

11 A. No. I don't recall.

12 Q. There's several ships that
13 you worked aboard in the shipyard.

14 Correct?

15 A. Yes.

16 Q. So, you wouldn't be able to
17 tell me which one, or ships that you
18 saw any Buffalo pumps?

19 A. No.

20 Q. Okay. And I understand, sir,
21 that you're not a machinist mate. Do
22 you ever recall observing any work
23 performed on a Buffalo pump?

24 A. I don't recall that.

25 Q. Okay. And, again, you wouldn't